

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MAHMOUD KHALIL,

Petitioner,

v.

WILLIAM P. JOYCE, et al.,

Respondents.

Case No. 25-CV-01935 (JMF)

**NOTICE OF MOTION TO WITHDRAW AS COUNSEL AND TERMINATE
REPRESENTATION AS COUNSEL OF RECORD FOR PETITIONER**

Pursuant to Rule 1.4 of the Local Rules of the United States District Court for the Southern District of New York, undersigned counsel writes to respectfully request the withdrawal and termination of representation as counsel of record in the above-captioned matter.

The petitioner will not be prejudiced by withdrawal of undersigned counsel, as several attorneys from the American Civil Liberties Union Foundation, ACLU Immigrants' Rights Project, Seton Hall Law School Center for Social Justice, New York Civil Liberties Union, the Center for Constitutional Rights, and Main Street Legal Services, Inc., as well as Amy Greer of Dratel & Lewis, are entered as counsel in this matter and will continue to serve as counsel for the petitioner going forward. There is no lien asserted in this matter. A proposed order is annexed hereto.

Dated: March 13, 2025
New York, New York

Respectfully submitted,

/s/ Kyle Barron

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Counsel for Petitioner